

From: "DAUGHERTY Katie" <Katie.J.DAUGHERTY@state.or.us>
To: "Young, Hunter" <Young.Hunter@epa.gov>
CC: David.J.LACEY <David.J.LACEY@state.or.us>
"Peterson, Lance" <peterstone@cdmsmith.com>
Date: 11/9/2020 6:04:46 PM
Subject: RE: Arkema Pre-Design Work Plan Response to Comments

Hi Hunter,

I know you were not asking for comments but I thought I would share DEQ's comments on the RTC with you.

DEQ has the following comments on LSS' October 27, 2020 *Response to EPA Comments on the Draft Pre-Design Investigation Work Plan, dated September 14, 2020*.

1. S19b – LSS indicates they will provide a summary of the *Arkema Upland Level II Screening Ecological Risk Assessment* dated January 19, 2009 in Section 2.7 of the PDI WP. DEQ modified the Level II Screening Ecological Risk Assessment. The summary should be based on the on the Level II Screening Ecological Risk Assessment with DEQ's final modifications.
2. S38 – DEQ recommends a plan for more robust riverbank sampling methods be developed as part of this phase of PDI work given the clear limitation of the proposed methods and the primary importance of the riverbank data in design work. Specifically, eliminate the hand auger as an option and move forward with a more appropriate sampling method such as sonic drilling.

LSS is planning to make several substantial revisions to the final PDI WP regarding groundwater plume extent, riverbank sampling and NAPL observations in riverbank and in-river. DEQ recommends EPA require an opportunity to review the proposed revisions prior to LSS issuing the final document. Without review of proposed revisions, DEQ has concerns that will need to be resolved in the Sufficiency Assessment (SA) and may result in additional PDI work.

1. G2c-Riverbank sample locations - Additional locations will be added and historical locations presented in Final WP. DEQ requests a figure with the proposed sampling locations be provided for review before the PDI WP is finalized.
2. S4 - The work plan should identify all plume reaching the river. The Preliminary Hot Spot Evaluation for the upland area has not been accepted by DEQ. Without review of LSS' revisions, it is unclear if this comment has been resolved and addresses DEQ's concerns.
3. S6 - GW monitoring at top of bank wells will be proposed in the final work plan to support seepage meter locations. Without more information it is not clear if the sampling will address DEQ's concerns.
4. S11a – Discussion of groundwater COC discharging to SMA will be included in WP. Without more information it is not clear if the sampling will address DEQ's concerns.
5. S19a – Riverbank debris evaluation will be include in PDI. Without more information it is not clear if the sampling is robust enough to address DEQ's concerns.

Please let me know if you have any questions.

Thanks

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From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Wednesday, October 28, 2020 11:54 AM
To:
Subject: FW: Arkema Pre-Design Work Plan Response to Comments

TCT,

Please see attached for the RTC from the Arkema team.

Thanks,

Hunter Young
U.S. Environmental Protection Agency
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(503)-326-5020

From: Michael PINTO <michael.pinto@total.com>
Sent: Tuesday, October 27, 2020 3:14 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: edodak@integral-corp.com
Subject: Arkema Pre-Design Work Plan Response to Comments

Hunter,

The attached table addresses EPA's comments on the Draft Pre-Design Investigation Work Plan for the Arkema Area submitted on June 18, 2020 by Legacy Site Services, agent for Arkema Inc.

LSS is looking forward to working with the EPA team to finalize the Arkema Project Area PDI work plan. Please let me know if you have any questions about this submittal. Thanks.

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